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ENERGY AND ENVIRONMENT CABINET
Department for Environmental Protection

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February 27, 2017

Ms. Tracey Duncan
US Department of Energy
Portsmouth/Paducah Project Site Office
5501 Hobbs Road
Paducah, Kentucky 42053

RE: Conditional Concurrence with the Addendum to the Remedial Investigation Report for the Burial Grounds Operable Unit SWMU 4 (DOE/LX/07-0030&D2/R1/A1/R1)
Paducah Site
Paducah, McCracken County, Kentucky
#KY8-890-008-982

Ms. Duncan:

The Division of Waste Management (Division) has completed its review of the *Addendum to the Remedial Investigation Report for the Burial Grounds Operable Unit SWMU 4*, dated January 27, 2017. In accordance with Section XX.I. of the Federal Facilities Agreement, please address the attached conditions in a revised version of the document.

If you have any questions or require additional information, please contact Gaye Brewer at (270) 898-8468, or e-mail at gayebrewer@ky.gov.

Sincerely,

A handwritten signature in black ink that reads "April J. Webb".

April J. Webb, P.E., Manager
Hazardous Waste Branch

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DWM File: #1110-C; Graybar: AIN20160006 (BGOU RI Report SWMU 4 Addendum)

**Kentucky Division of Waste Management Conditions pertaining to the
Addendum to the Remedial Investigation Report for the Burial Grounds Operable Unit
Solid Waste Management Unit 4**

Paducah Site, Paducah, Kentucky,

DOE/LX/07-0030&D2/RI/AI/R1

January 27, 2017

Specific Comments:

1. Page ES-3, "Data Gap 4", 1st paragraph:

The first sentence of this paragraph "The results of this ..." is accurate and summarizes the data gathered concerning Tc-99 in soils. The subsequent conclusion that "[t]herefore, Tc-99 at SWMU 4 is not a component of any PTW" is an overly definitive statement given the uncertainty in both characterization and extant, disposal records.

Please expunge the sentence, "Therefore, Tc-99 at SWMU 4 is not a component of any PTW." Replace the sentence with the following sentence: "The collected data does not support identifying Tc-99 as PTW."

2. Page ES-3, "Data Gap 4", 3rd paragraph and associated text box:

In the 3rd paragraph, first sentence please restore the previously proposed "(i.e., uranium shavings and sawdust, drums of uranyl fluoride solution, bulk uranium, and pyrophoric uranium)" and "potential uranium source materials" as descriptors of wastes found in SWMUs 2 and 3.

3. Page ES-3, "Data Gap 4", 3rd paragraph and associated text box:

To reaffirm the statement contained in the February 10, 2012 Resolution Agreement regarding SWMU 3 waste possibly having been disposed of in SWMU 4, please insert the following sentence as the final sentence in the text box, "However, the parties recognize that high-concentration uranium waste intended for disposal at SWMU 3, based upon site history and process knowledge, may be present at SWMU 4 (possibly in the form of sludge)."